UNITED STATES DISTRICT COURT EASTERN DISTRICT OF VIRGINIA Richmond Division

MICHELLE BOURDELAIS,

Plaintiff,

v. Civil Action No. 3:10-cv-670

JPMORGAN CHASE BANK, NA, and CHASE HOME FINANCE, LLC,

Defendants.

AGREED MOTION FOR ENLARGEMENT OF TIME TO RESPOND TO MOTION FOR PROTECTIVE ORDER *ON PRIVILEGED DOCUMENTS* BY CHASE HOME FINANCE, LLC, JPMORGAN CHASE BANK, N.A. (Docket No. 74)

COMES NOW Plaintiff, Michelle Bourdelais, by counsel, with the agreement and consent of Defendants, JPMorgan Chase Bank, N.A. and Chase Home Finance, LLC (collectively, "JPMorgan Chase"), by counsel, and pursuant to Fed. R. Civ. P. 6(b)(1)(A) she moves for leave to respond to Defendants' pending Motion for Protective Order for an additional week, seven (7) calendar days from December 28, 2012 to January 4, 2013. The Parties have continued in the dual-tract process of meeting and conferring regarding Defendants' discovery response and objections, and with settlement negotiations. Furthermore, the Plaintiffs' response date comes at a time during which Plaintiff's counsel remains limited in resources because of holiday closures.

Defendants have agreed and consented.

Respectfully submitted,

MICHELLE BOURDELAIS,

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of December 2012, I will file the foregoing Disclosure electronically using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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s/____

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